

McGuireWoods LLP  
888 16th Street N.W., Suite 500  
Washington, DC 20006  
Phone: 202.857.1700  
www.mcguirewoods.com

Michael L. Francisco  
Direct: 202 857 1722

McGUIREWOODS

mfrancisco@mcguirewoods.com

November 17, 2023

**BY EMAIL**

Maya Eckstein  
Hunton Andrews Kurth LLP  
951 E. Byrd St.  
Richmond, Virginia 23219  
[meckstein@huntonak.com](mailto:meckstein@huntonak.com)

**Re: Objections to Requests for Production *Doe v. Mast*, No. 3:22-cv-49-NKM (W.D. Va.)**

Dear Ms. Eckstein:

As you know, we represent Joshua and Stephanie Mast in this matter. We write in response to your email on Wednesday November 16 regarding discovery in this matter.

First, by separate letter sent today, we have identified the RFPs that we object to as being overly broad and request clarification in advance of production of documents.

Second, you claimed that we have not responded to your question about Joshua Masts' signal account and certain settings for deletion of messages. It is not correct to claim that we have not "answered" your question about this point. We previously have indicated, and continue to indicate, we are well aware of the legal discovery obligations on our client and we are in compliance with all applicable obligations. If and when you depose Mr. Mast in this matter, you can ask him specific questions.

Your letter also reiterated the timing of document production previously discussed on November 16. We have no material updates at this time. We are diligently working to produce documents on the previously indicated timeframe.

Third, you state that you would like to confer on "these issues" next week. Nothing in your email, however, identifies a deficiency or potential motion that requires conferral. We presume that your stated intention during the October 11 hearing to produce documents on a "rolling" "30-60" day basis will be treated as an acceptable process for all parties to follow. Nonetheless,

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this letter addresses points in your letter and should allay any concerns you have with the discovery process. Of course, we remain ready and able as needed to confer about any identified discovery deficiencies when those are identified.

Respectfully,

/s/ Michael L. Francisco

John S. Moran

Michael L. Francisco (*pro hac vice*)

**McGUIREWOODS LLP**

888 16th St. N.W., Suite 500

Black Lives Matter Plaza

Washington, DC 20006

T: (202) 828-2817

F: (202) 828-3327

[jmoran@mcguirewoods.com](mailto:jmoran@mcguirewoods.com)

[mfrancisco@mcguirewoods.com](mailto:mfrancisco@mcguirewoods.com)

*Counsel for Defendants Joshua and Stephanie Mast*

CC: Counsel of record